



U.S. Department of Justice

United States Attorney
Southern District of New York

The Jacob K. Javitz Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278

August 1, 2025

VIA ECF

The Honorable Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. John Mattera*, 24 Cr. 117 (LAP)

Dear Judge Preska:

The Government writes on behalf of the parties in the above-captioned matter to respectfully request that the Court enter on consent the following pre-trial deadlines in light of the recently scheduled October 14, 2025 trial date:

- August 14: Parties to make expert disclosures and defense to provide notice of any defense invoking the advice or presence of counsel.
- September 8: Government to provide any notice pursuant to Rule 404(b).
- September 9: Parties to submit proposed *voir dire* questions, jury instructions, and verdict form.
- September 12: Government to produce 3500 material.
- September 15: Government to produce, subject to good-faith amendment and supplementation, a preliminary set of exhibits and exhibit list.
- September 15: Parties to submit any motions *in limine*, including *Daubert* motions.
- September 26: Parties to submit any oppositions to motions *in limine*.
- October 1: Government to produce, subject to good-faith amendment and supplementation, a preliminary witness list.
- October 6: Defense to produce, subject to good-faith amendment and supplementation, a preliminary witness list.
- October 9: Defense to produce, subject to good-faith amendment and supplementation, a preliminary set of exhibits and exhibit list.
- October 10: Defense to produce 26.2 materials.

Additionally, the Government respectfully requests that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161 (h)(7)(A), from today until the October 14, 2025 trial date. Such an exclusion would be in the interests of justice because it would allow the defense time to review discovery and prepare for trial. The defense consents to this request.

Accordingly, and in the interests of facilitating the parties' preparations for trial, the Government respectfully requests that the Court endorse this letter, enter the aforementioned deadlines, exclude time, and schedule a final pretrial conference at the Court's convenience.

Respectfully submitted,

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Cc: Counsel (by ECF)